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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

AARON SENNE, *et al.*,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF  
BASEBALL, an unincorporated association  
doing business as MAJOR LEAGUE  
BASEBALL, *et al.*,

Defendants.

Case No. CV 14-00608 JCS (consolidated  
with 3:14-cv-03289-JCS)

Hon. Joseph C. Spero

**CLASS ACTION**

**DECLARATION OF ELISE M.  
BLOOM IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
LEAVE TO FILE A MOTION FOR  
DECERTIFICATION OF THE RULE  
23 CLASSES AND FLSA  
COLLECTIVE**

1 I, Elise M. Bloom, declare as follows:

2 1. I am a partner at Proskauer Rose, LLP, counsel for all Defendants in this matter.

3 2. I submit this declaration in support of the Defendants' Motion for Leave to File a  
4 Motion for Decertification of the Rule 23 Classes and FLSA Collective.

5 3. I have personal knowledge of the facts contained in this declaration, and if called  
6 to testify, I could and would testify competently thereto.

7 4. Attached hereto as **Exhibit 1** is a true and correct copy of the relevant excerpts of  
8 Michael Hart's Deposition ("Hart Tr."), taken on June 28, 2016.

9 5. Attached hereto as **Exhibit 2** is a true and correct copy of the relevant excerpts of  
10 Bryan Henry's Deposition ("Henry Tr."), taken on June 28, 2021.

11 6. Attached hereto as **Exhibit 3** is a true and correct copy of the relevant excerpts of  
12 Mitchell Hilligoss' Deposition ("Hilligoss Tr."), taken on January 20, 2016.

13 7. Attached hereto as **Exhibit 4** is a true and correct copy of the relevant excerpts of  
14 Jake Kahaulelio's Deposition ("Kahaulelio Tr."), taken on October 22, 2015.

15 8. Attached hereto as **Exhibit 5** is a true and correct copy of the relevant excerpts of  
16 Kristopher Watts' Deposition ("Watts Tr."), taken on February 11, 2016.

17 9. Attached hereto as **Exhibit 6** is a true and correct copy of the relevant excerpts of  
18 Dr. J. Michael Dennis' Deposition ("Dennis Tr."), taken on September 20, 2021.

19 10. Attached hereto as **Exhibit 7** is a true and correct copy of the relevant excerpts of  
20 Dr. Brian Kriegler's Deposition ("Kriegler Tr."), taken on September 22, 2021.

21  
22 I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of  
23 January, 2022.

24 /s/ Elise M. Bloom

25 Elise M. Bloom